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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

RICHARD ZEITLIN, ADVANCED  
TELEPHONY CONSULTANTS, MRZ  
MANAGEMENT, LLC, DONOR  
RELATIONS, LLC, TPFE, INC., AMERICAN  
TECHNOLOGY SERVICES, COMPLIANCE  
CONSULTANTS, CHROME BUILDERS  
CONSTRUCTION, INC., and UNIFIED  
DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A., and JOHN and  
JANE DOES 1-100,

Defendants.

Case No.: 2:18-cv-01919-RFB-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE RESPONSE  
TO AND REPLY IN SUPPORT OF  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT**

**(FIRST REQUEST)**

Pursuant to Local Rules IA 6-1, 7-1, and 7-2, Plaintiffs Richard Zeitlin; Advanced  
Telephony Consultants; MRZ Management, LLC; Donor Relations, LLC; TPFE, Inc.; American  
Technology Services; Compliance Consultants; Chrome Builders Construction, Inc.; and Unified  
Data Services (the "Plaintiffs") and Defendant Bank of America, N.A. ("BANA"), by and  
through their respective undersigned counsel of record, submit this Stipulation and Proposed  
Order for a 2-day extension of Plaintiffs' deadline to file their response to BANA's Motion for  
Summary Judgment (ECF Nos. 114, 115) (the "Motion") from July 12, 2021, Plaintiffs' current

1 deadline to respond pursuant to ECF No. 130, to July 14, 2021. BANA's Motion was filed, along  
2 with a Motion to Seal, on May 24, 2021. [ECF Nos. 113-115.]

3 The Parties also request that the deadline for BANA to file a reply in support of its Motion  
4 be extended to July 28, 2021. BANA's deadline to file a reply is currently July 19, 2021. [ECF  
5 No. 130.]

6 This is the Parties' first request for an extension of the briefing deadlines for the Motion  
7 and is not intended to cause any delay or prejudice to any party. The reason for the extension is to  
8 give the Parties time to evaluate and respond to the arguments set forth in the Motion and  
9 Plaintiff's response to the Motion.

10 IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time  
11 for Plaintiffs to file their response to the Motion is extended to and through July 14, 2021 and the  
12 time for BANA to file its reply in support of the Motion is extended to and through July 28, 2021.

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1 **IT IS SO STIPULATED.**

2 Dated: July 12, 2021

3 THE BERNHOFT LAW FIRM, S.C.

4 /s/ Daniel James Treuden

5 Robert G. Bernhoft, Esq.

6 Admitted *Pro Hac Vice*

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20 *Attorneys for Plaintiffs*

Dated: July 12, 2021

SNELL & WILMER L.L.P.

/s/ Holly E. Cheong

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*Attorneys for Defendant Bank of America,  
N.A.*

**IT IS SO ORDERED.**



UNITED STATES DISTRICT JUDGE

DATED: July 12, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSE TO AND REPLY IN SUPPORT OF DEFENDANT'S MOTION FOR SUMMARY JUDGMENT (FIRST REQUEST)** with the Clerk of the Court for the U. S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: July 12, 2021

/s/ Maricris Williams  
An Employee of Snell & Wilmer L.L.P.